

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
 Plaintiff,)
)
)
 vs.) Case No. 4:19CR-00960 AGF/NAB
)
 HAMMED AKANDE,)
)
)
 Defendant.)

**DEFENDANT’S OBJECTIONS TO THE
PRESENTENCE INVESTIGATION REPORT**

COMES NOW, Defendant, Hammed Akande, by and through counsel, and hereby objects to the Presentence Investigation Report as follows:

1. Defendant objects to paragraph 41 of his Presentence Investigation Report (“PSR”). It is the Defendant’s position that the offense in this case did not involve sophisticated means and therefore a two level enhancement should not be added.
2. Defendant objects to paragraph 44 of his PSR. It is Defendant’s position in this case that the Defendant did not willfully obstruct or impede administration of justice with respect to the investigation of the instant offense of conviction, and therefore a two-level enhancement should not be added.
3. Defendant objects to paragraph 45 of his PSR stating the Adjusted Offense Level is 29, based on Defendant’s previously stated objections to paragraphs 41 and 44. If Defendant’s objections in paragraphs 41 and 44 are sustained and granted than the Adjusted Offense Level would be a 25.
4. Defendant objects to paragraph 49 of his PSR stating the Total Offense Level is a 26, based on Defendant’s previous objections of paragraphs 41,

44, and 45. If Defendant's objections in paragraphs 41, 44, 45 are sustained and granted than the Total Offense Level would be a 22.

5. Defendant objects to paragraph 80 which states the Guideline range is a 26. If Defendant's previously stated objections are granted, based on Total Offense Level of 22 and a Criminal History category of I, the guideline imprisonment range is 41 months to 51 months.
6. Defendant objects to paragraph 82, which states that a Two-Level enhancement for Sophisticated Means should apply.
7. Defendant objects to paragraph 83, which states that a Two-Level enhancement for Obstruction of Justice should apply.

WHEREFORE, Defendant requests that this Honorable Court grant his objections and recalculate his Total Offense Level accordingly or set this matter for a hearing.

Respectfully submitted,

/S STEVEN E. SOKOLIK
Steven E. Sokolik, 46134MO
Attorney for Defendant
7700 Bonhomme Ave, Ste. 350
Clayton, Missouri 63105
(314) 795-3479 fax (314) 727-8529

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically this 1st day of June 2020, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all interested parties.

/S STEVEN E. SOKOLIK

Steven Sokolik, 46134MO

Attorney for Defendant